

### **REMARKS**

Claims 1, 3-6, 13-14, and 17-21 are pending. Claims 2, 7-12, and 15-16 are cancelled without prejudice. Claims 1, 3-6, 13-14, and 17-20 are amended. No new matter was added. Support for the amendments may be found in at least paragraphs 9, 26, 28, 31-33, 41, 52, 208, 215-224, 229, 264, 269-279, 287, 313, 385-387 of the specification. Applicants respectfully request reconsideration in view of the amendments and the following remarks.

#### **Claim Rejections – 35 U.S.C. § 112**

Claims 1, 13, and 20 were rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. In particular, it was asserted that the specification does not describe "movement of data" and "associating, at the at least one server, the unique identifier ... with a unique location identifier of a different data generating device." Applicants respectfully disagree with this rejection, however amendments to Claims 1, 13, and 20 render the rejections moot.

For example, amended Claim 1 recites "the at least one server associating the unique identifier with a second unique location identifier of the data generating device in response to a change in a location of the data generating device." (emphasis added) Support for these terms may be found in at least paragraphs 9, 26, 28, 229, 264, 287, 288 and 386 of the specification.

For example, the specification describes:

*After recording information, the present invention tracks indices to locations of information. If the location of the device changes, that information could be tracked by the DDNS level 1 server so that queries could be automatically rerouted to the location at which the device is currently housed.*

(Specification, ¶ 26 (p. 6, lines 10-14)).(emphasis added) The invention tracks indices to "locations of information." (*Id.*) Information may be generated by and stored on a device: "the present invention allows the minimal set of possible information at the top-

level, which is used for routing requests for information, with actual information created by individual devices or sites stored and located at those devices or sites." (Specification, ¶ 28.) (emphasis added) Therefore, at least Paragraph 26 describes tracking the location of the information stored on the device "in response to a change in a location of the data generating device."

In one example, the change in the location of the device "could be tracked by the DDNS level 1 server." (Id. at 26.) After the location of the device changes, "queries could be automatically rerouted to the [new] location." (Id.) The "device driven unique identifiers ... identify objects that are the subject of transactions." (Id. at ¶ 9 (p. 3, lines 9-10).) (emphasis added) The "queries" referred to in paragraph 26 are one type of such transactions: "transactions provide genuinely global searching, retrieving, adding, and removing records from universal databases." (Id. at ¶ 75.)

The specification describes the details of tracking the location of the device through "associating, at the at least one server, the unique identifier with a second unique location identifier of the data generating device." For example, the following describes "associating the unique identifier with a first unique location identifier of a data generating device:"

*Since DDNS-1 Servers have not yet seen record '19981211@1' DDNS-1 Servers store it. Using the From: field, DDNS-1 Servers further associate '19981211@1' with address 'ddns-2.uch.edu.' DDNS-1 Servers will now forward future Lookup requests for record '19981211@1' to DDNS-2:UCH.*

(Specification, ¶ 229.) (emphasis added) In this example, the DDNS level 1 servers associate the unique identifier "19981211@1" with a first unique location identifier "DDNS-2:UCH." The specification then describes an example of "associating ... the unique identifier with a second unique location identifier." For example:

*Since DDNS-1 Servers already know about record '19981211@1', DDNS-1 Servers store the address in the From: header (ddns-2.mag.org) as a location that will answer queries for global record '19981211@1'.*

(Specification, ¶ 287.) In this example, the DDNS level 1 server associates the unique identifier "19981211@1" with the second unique location identifier "ddns-2.mag.org." As a result, "[f]uture Lookup requests for record '19981211@1' now will receive

forwarding instructions for both DDNS-2:MAG and DDNS-2:UCH. DDNS-1." (Specification, ¶ 288.)

Consequently, the specification teaches one skilled in the art how to make and use the full scope of Claim 1 without undue experimentation. The Federal Circuit has repeatedly held that "the specification must teach those skilled in the art how to make and use the full scope of the claimed invention without 'undue experimentation'." *In re Wright*, 999 F.2d 1557, 1561, 27 USPQ2d 1510, 1513 (Fed. Cir. 1993). Nevertheless, not everything necessary to practice the invention need be disclosed. MPEP §2164.08. How a teaching is set forth, by specific example or broad terminology, is not important. *In re Marzocchi*, 439 F.2d 220, 223-24 169 USPQ 367, 370 (CCPA 1971). Therefore, the features of Claim 1 are fully enabled by the specification.

Additionally, the features of Claims 13 and 20 are fully enabled by at least the same paragraphs of the specification on similar grounds. Consequently, withdrawal of the Section 112 rejections of Claims 1, 13, and 20 is respectfully requested.

#### **Claim rejections – 35 U.S.C. § 102**

Claims 1, 3-6, 13-17 and 19-21 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,995,965 to Experton ("Experton"). Claims 15-16 are cancelled rendering their rejections moot. As explained below, Experton does not describe all of the features recited in Claims 1, 3-6, 13-17 and 19-21.

#### **Claim 1**

Experton fails to describe all of the features recited in Claims 1. For example, Experton fails to describe "the one of the servers, in response to the query received from the client machine, querying at least one parent server of the one of the servers until the second unique location identifier associated with the unique identifier is found, the at least one parent server included in the servers [in a tree structure]." (emphasis added) Instead, Experton describes "the smart card" sending "activating data" to a local processing unit 200. (Experton, Col. 8, lines 30-31.) The "[a]ctivating data will ... include remote network address data which identifies the network addressees[sic] of each remote processing facility 300, ..., 300m." (Col. 8, lines 35-37.) Alternatively, the

network address data may be stored in the processing unit 200. (Col. 8, lines 49-51.) In either case, Experton fails to describe the one of the servers, in response to the query received from the client machine, querying at least one parent server of the one of the servers until the second unique location identifier associated with the unique identifier is found.

Another reason why Experton fails to describe Claim 1 is that Experton fails to describe "transmitting the second unique location identifier to the client machine in response to the query received at the one of the servers." In sharp contrast, Experton describes the network address data as stored on either the smart card or the local processing unit 200. (Col. 8, lines 35-37; and Col. 8, lines 49-51.)

Still another reason why Experton fails to describe Claim 1 is that Experton fails to describe "the at least one server associating the unique identifier with a second unique location identifier of the data generating device in response to a change in a location of the data generating device." (emphasis added) Instead, Experton describes "a central list of user information sites ... maintained at one of the facilities or at some other agreed-upon site." (Experton, Col. 6, lines 12-14.) (emphasis added) The purpose of maintaining the list of user information sites so that "facilities can then contact each other periodically in order to update data that is held in common." (Col. 6, line 10-11.) In other words, Experton describes data replication amongst the facilities "in order to eliminate the risk of mutually contradictory stored data." (Col. 6, lines 4-5.) Experton does not describe "a change in a location of the data generating device." (emphasis added) True, Experton does describe changing records. (Col. 6, line 15.) However, a record is not a data generating device—instead, a record is "a single file ... or any other conventional data structure" stored at a remote processing unit or facility. (Col. 6, lines 39-40; See also, Col. 5, lines 50-60.) (emphasis added) For at least the foregoing reasons, Experton fails to describe all of the features of Claim 1.

### Claims 3-6

Claims 3-6 depend from Claim 1. Thus, the allowability of dependent Claims 3-6 directly follows from the allowability of independent Claim 1.

**Claims 13, 14, 17, and 19**

Although Claim 13 is of different scope than Claim 1, for reasons similar to those given above in connection with Claim 1, Experton fails to describe all of the features of Claim 13. For example, Experton fails to describe the features of "the at least one server changing an association of a unique identifier and a first unique location identifier of a data generating device to an association of the unique identifier and a second unique location identifier of the data generating device in response to changing a network location of the data generating device."

Claims 14, 17, and 19 depend from Claim 13. Thus, their allowability directly follows from the allowability of Claim 13. Reconsideration is respectfully requested.

**Claims 20-21**

Although Claim 20 is of different scope than Claim 1, for reasons similar to those given above in connection with Claim 1, Experton fails to describe all of the features of Claim 20. For example, Experton fails to describe "associating the unique identifier with a second unique location identifier of the data generating device in response to changing the location of the data generating device."

Claim 21 depends from Claim 20. Accordingly, the allowability of dependent claim 21 directly follows from the allowability of independent claim 20.

For at least the foregoing reasons, Experton fails to describe all of the features of Claims 1, 3-6, 13-14 and 19-21. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 102(e) rejections of Claims 1, 3-6, 13-14 and 19-21.

**Claim rejections – 35 U.S.C. § 103**

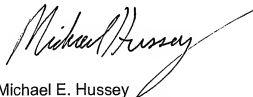
Claim 18 was rejected as obvious in view of the combination of Experton and U.S. Patent No. 5,345,586 to Hamala et al. ("Hamala"). Experton and Hamala, either separately or in combination, do not teach or suggest all of the recited features of Claim 18.

Claim 18 depends from Claim 13. As explained in connection with the 35 U.S.C. § 102 rejection of Claim 13, Experton fails to describe all of the features of Claim 13. The cited portions of Hamala also fail to describe the missing features. For example, Hamala fails to describe the features of "the at least one server changing an association of a unique identifier and a first unique location identifier of a data generating device to an association of the unique identifier and a second unique location identifier of the data generating device in response to changing a network location of the data generating device." (emphasis added) Instead, Hamala describes a global data directory 50 that includes data model tables which may be used to manipulate heterogeneous data. (Col. 4, lines 55-63.)

For at least the foregoing reasons, neither Experton nor Hamala, alone or in combination, describe all of the features of the rejected claims. Consequently, an assertion that the claim features are independently known in the cited references is factually unsupported. Accordingly, withdrawal of the 35 U.S.C. § 103 rejection of Claim 18 is respectfully requested.

Applicants submit that pending claims 1, 3-6, 13-14, and 17-21 of this application are allowable and Applicants respectfully request the Examiner to issue a Notice of Allowance for this application. Applicants reserve the right to refile the canceled claims, and unamended versions of the amended claims, in a continuation application. Should the Examiner deem a telephone conference to be beneficial in expediting allowance/examination of this application, the Examiner is invited to call the undersigned attorney at the telephone number listed below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Hussey", with a long, sweeping horizontal stroke extending to the right.

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